Part 3J: Anchors & Cables
Proposal Summary for Consultation

This document is part of a series of documents to support consultation on changes to the existing Design, Construction and Equipment rules (the DCE rules). Other documents that form part of the consultation package include:

- *Invitation to Comment* - An overview of the consultation package and summary of the proposals, including information on how to have your say on the proposals.
- *Proposal summaries* - Details of the proposed changes for each of the four Rule topics being consulted on: Life-saving Appliances, Fire Protection, Machinery and Ancillary Equipment, and Anchors and Cables. This document is the proposal summary for Anchors and Cables.
- *Draft Maritime Rules and draft Maritime Transport Instruments (MTIs)* – a set of rules and MTIs for each of the four Rule topics.
- *What does this mean for me* – the main implications of the proposed changes for 14 representative vessels we consider reflect the majority of the New Zealand domestic commercial fleet.
- A template to support preparation of your submission.

These documents, and other supporting information, can be accessed at www.maritimenz.govt.nz/public/consultation/DCE-40-series-package-1/

Contents

Purpose of this document

1. Maritime New Zealand - Nō te rere moana Aotearoa (Maritime NZ) is proposing significant reform of the Maritime Rules for vessel design, construction and equipment (the DCE Rules).

2. This document provides the detailed analysis of the proposed new Anchors and Cables Rules and Maritime Transport Instrument (MTI). It explains our understanding of the issues and current situation (the 'status quo') under the present rules, and sets out the analysis and rationale behind the proposed changes. Any potential impacts we have identified from the proposed amendments are also described. The information included is intended to meet the Government's Regulatory Impact Analysis requirements.

3. This document should be read in combination with the *Invitation to Comment* and other documents that form part of the consultation package, available on Maritime NZ's website at www.maritimenz.govt.nz/public/consultation/DCE-40-series-package-1/.

> Note: The word 'ship' is used in the Maritime Transport Act 1994 and the proposed Rules and MTIs. This term is used to refer to any kind of boat or craft and does not refer to a craft of a specific size. For the avoidance of doubt, the terms vessel, ship and boat can be used interchangeably. This document uses the term 'vessel'.

Introduction to Anchors and Cables

4. An anchoring system – anchor, cable, accessories (components to connect the anchor and cable), and a winch – is required to hold a commercial vessel to the sea floor when needed. To do this effectively, the anchors, cables and accessories must be heavy enough and/or strong enough to hold the weight of the vessel and the windage it generates. They must be able to be deployed quickly and must function reliably.

5. The proposed approach to Anchors and Cables aligns requirements across the rules for passenger, non-passenger, fishing and sailing vessels, where practical. Requirements are based on risk and where the vessel operates, rather than vessel type. Options have been added for the type of anchor or cable that can be used.

Reasons the Anchors and Cables rules need change

6. The proposed new rules address a range of issues with the current Anchors and Cables rules:

   - **Separate rules for anchors and cables based on vessel type are not justified.** The current rules are in nine different locations largely based on vessel type. (Part 40A and Appendix 7 of Part 40A; Part 40C and Appendix 6 of Part 40C; Part 40D and Appendix 4 of Part 40D; Part 40E and Appendix 6 of Part 40D; and Part 41 Anchors and Chain Cables). Most of this content is the same or similar, and is repeated across the different rule parts.

   - **The current rules in Part 41 do not prescribe a 'level playing field'.** Different and more onerous requirements apply to anchors and chain cables made in New Zealand compared to the same items made overseas. There is no need to have different requirements.

   - **Thresholds for certification are overly onerous for smaller vessels.** Standard anchors of 75 kgs or more, and chain cable of 12.5 mm in diameter or more require certification by a recognised classification society. Recognised classification societies have good systems and processes. However, the 'full third-party certification' model was borrowed from rules that apply to large ocean-going vessels. The current certification requirements for vessels under 24 metres in length are much higher than comparable jurisdictions (e.g. the UK, EU or Canada) and are not justified for smaller vessels. In addition, this kind of certification adds cost, and certified anchors and are not always readily available or accessible for vessel operators.

Summary of proposed changes

7. The main changes proposed in the new Anchors and Cables Rules and Maritime Transport Instrument are outlined in the tables below under the following four proposal headings and summarised in Appendix 1:

   - **Proposal 1: Reducing certification requirements for anchors, chain cables and accessories**
   - **Proposal 2: Allowing steel wire rope to be used as anchor cable**
   - **Proposal 3: Allowing super high holding power (SHHP) anchors**
   - **Proposal 4: Allowing a passenger vessel of less than 24 metres in length, that would otherwise require two anchors, to carry a single anchor**

8. The tables provide a summary of the proposed changes, the rationale for those changes and potential impacts.

9. The proposed changes to the current Anchors and Cables rules are based on risk. They provide operators with more options for the anchors and cables they use, and seek to reduce unnecessary costs. For example,

   - Reduced certification requirements could reduce costs over time for up to 1000 vessels.
   - The proposals to allow SHHP anchors, and to allow some passenger vessels operating as a ferry to carry a single anchor, will both increase choice and reduce cost.
   - The proposal to allow steel wire rope as anchor cable will increase choice.

What do the changes mean for my ship/vessel/boat?

10. The proposed Anchors and Cables Rule and Maritime Transport have been tested against 14 representative vessels that we consider represent the majority of the New Zealand domestic commercial fleet. The 14 ‘worked examples’ help to illustrate what the new rules will do. A blank template is provided to enable readers to undertake their own assessment by applying the rules and MTI to their specific circumstances. The ‘worked examples and blank template are available on the website page at: www.maritimenz.govt.nz/public/consultation/DCE-40-series-package-1/.

11. In addition, a ‘snapshot’ of the proposed Anchors and Cables changes by vessel type, length and operating limit is included in *Appendix 1* to this document.

Please note that we cannot guarantee that this document includes all changes that may have an impact on a vessel or operation. Therefore we strongly recommend you also refer to the draft rule and maritime transport instrument.

Proposal 1: Reducing certification requirements for anchors, chain cables and accessories

What we are proposing

Vessels of 24 metres or more in load line length. Testing and certification of anchors and chain cables by recognised classification societies will be required. This is the same as the current rules.

Vessels of less than 24 metres in length. Certificates issued by the manufacturer will be required for anchors of 75 kgs or more and chain cables and accessories of 14mm or more (increased from the current 12.5mm). This proposal will reduce certification requirements compared with the current rules, and will more closely align with Australia.

These proposals more accurately reflect the risks involved, and align better with Australia and other comparable jurisdictions. Costs for many operators should reduce.

Status quo

The current rules require full certification – i.e. approval and testing by a recognised classification society – for all anchors weighing 75 kgs or more and chain cable of 12.5 mm in diameter or more.

What is the problem / rationale for the change?

Full certification for vessels of less than 24m is not warranted

Full certification of anchors, chain cable and accessories adds cost. The design of items must be approved and then each manufactured item must be individually assessed and certified by a recognised classification society. From a risk perspective, our assessment is that this cost is not justified for vessels of less than 24 metres in length because they do not generate large forces on the anchor and cable. Full certification has been borrowed from rules that apply to large ocean-going vessels, which exert far greater force on anchors and chain cables because, as vessels increase in length, their increase in weight and surface area is logarithmic rather than linear.[1] In addition, large ocean-going vessels typically wait at anchor while waiting to be berthed, so their anchors and cables are frequently used, while MOSS vessels typically leave and return to a berth without ever using the anchor.

Operators can face delays in obtaining appropriately certified items, as New Zealand suppliers do not hold stocks of certified items.

Full certification for vessels of less than 24m does not align with comparable jurisdictions

Jurisdictions such as the United Kingdom, the European Union and Canada do not require full certification of anchors and cables for vessels of less than 24 metres in length. The current rules do not align with the Australian National Standard for Commercial Vessels (NSCV), which does not require testing and approval of individual items by a classification society. This creates difficulties assessing compliance for second-hand vessels imported from Australia.

The12.5mm threshold for chain cable does not align with the 75 kgs anchor weight

Under the current rules, the thresholds at which anchors and chain cables require certification do not align. A cable of 12.5mm must be certified, but is allowed to carry an anchor weight of 44 kgs. An anchor does not require certification until it is 75 kgs or more. The anchor and cable work as a system - it is not logical to certify one part but not another part attached to it which could also fail.

Impact of the proposed change

Changing certification requirements will provide the following benefits:

- Costs for around 1000 operators should reduce when they replace anchors, chain cables and accessories.

[1] Ie a doubling in vessel length might result in 4 times the windage and 8 times the tonnage. This means that as a vessel gets larger the windage and gross tonnage dramatically increase

- Supply chain issues should ease.
- Requirements will more closely align with Australia, so transaction costs associated with importing second-hand vessels of less than 24 metres in length from Australia will reduce.

This proposal does not impose any additional costs.

Timing / Commencement date

Changes to certification requirements for anchors, chain cables and accessories will take effect on commencement of the Part 3J: Maritime (Design, Construction and Equipment – Anchors and Cables) Rules. The estimated in-force date is currently early 2026.

Options analysis

The following two options were considered:

Option 1: (Status quo). Continue the current approach of requiring full certification – i.e. approval and testing by a recognised classification society – for all anchors weighing 75 kgs or more and chain cable of 12.5 mm in diameter or more.

Option 2: (Preferred option). New rules that require certificates issued by the manufacturer for anchors of 75 kgs or more and chain cables and accessories of 14mm or more on vessels of less than 24 metres in length; and full certification required for vessels of 24 metres or more in length. This option is better aligned with comparable jurisdictions, and will largely resolve difficulties associated with establishing compliance of anchors and cables on second-hand vessels imported from Australia.

How do the options compare against the status quo

The following criteria have been used to assess the alternative option. Refer to Table 3 for an assessment against these criteria.

The changes provide flexible and adaptive regulation:	Option 2 is more nuanced than the status quo, and has a better alignment with other comparable jurisdictions.
Rules are clear and easier to understand and apply:	Option 2 is straightforward and offers significant improvements over the status quo.
Maritime safety is maintained or enhanced:	The safety of anchors and cables under Options 2 is comparable to the status quo. The designated thresholds provide an appropriate balance between risk and cost.
Changes are practical and economically viable:	Option 2 is practical to implement, and provides cost benefits compared to the status quo.

Table 3: Comparing options against the status quo. Reducing certification requirements for anchors, chain cables and accessories

	1. Status Quo	2: Manufacturer certificates for anchors 75 kgs or more & chain cables and accessories 14mm or more; full certification vessels 24m or more
Provides flexible and adaptive regulation	0	++
Rules that are clear and easier to understand and apply	0	++
Maritime safety is maintained or enhanced	0	+
Changes are practical and economically viable	0	++

Part 3J Anchors and Cables: Proposal summary

Overall assessment	**0**	**++**

Key for qualitative judgements:

++	Much better than doing nothing/the status quo/counterfactual
+	Better than doing nothing/the status quo/counterfactual
0	About the same as doing nothing/the status quo/counterfactual
-	Worse than doing nothing/the status quo/counterfactual
- -	Much worse than doing nothing/the status quo/counterfactual

Preferred option
Reducing anchor and cable certification requirements for vessels of less than 24 metre sin length (Option 2) is the preferred option. It meets all criteria and is better or much better than the status quo.
What are the marginal costs and benefits of the preferred option?
Surveyors and suppliers of anchors, chain cables and accessories may face minor transaction costs adjusting to the new general requirements statements in the rules. However, these are significantly outweighed by reductions in transaction costs and actual costs associated with meeting the new lower certification requirements. Refer to Table 4 and the associated Assumptions and Notes.

Table 4: Marginal costs and benefits of reducing certification requirements for anchors, cables and accessories

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
Vessel owners and operators, surveyors and suppliers	Will need to become familiar with the new rules.	Low	High Proposal is straightforward, & Maritime NZ has engaged with the sector.
Total monetised costs	-	-	-
Non-monetised costs	Users of the Maritime Rules will need to become familiar with the new rules.	Low	High Proposal is straightforward
Additional benefits of the preferred option compared to taking no action			
Vessel owners and operators	Reduced transaction costs. Rules will have better alignment with the NSCV. More straightforward to determine compliance for second-hand vessels imported from Australia.	Low	High Significant improvement, but does not impact many vessels
	Lower certification costs.	$400 per operator (when anchors and cables are replaced) (see assumptions and notes)	Medium See Assumptions and Notes
Total monetised benefits	Lower certification costs.	Medium	Medium
Non-monetised benefits	Reduced transaction costs.	Low	High

Assumptions and Notes

- Non-monetised costs are based on observations that an investment of time is required for sector participants to understand regulatory changes. These have been assessed as Low because the changes are straightforward and have been developed in consultation with the sector.
- Non-monetised benefits have been assessed as Low, because although transaction costs have been an issue of concern to the sector, only around 20 vessels per year are imported from Australia.
- By comparing anchor weight tables with a breakdown of the size of vessels in the domestic commercial fleet, up to 1000 vessels of less than 24 metres in length currently require certified anchors and cables. The operators of these vessel could save up to $400 when they replace an anchor or chain cable.
  Note 1. This number is an estimate, as data on vessel heights (which partially determine anchor weight) is not available.
  Note 2. Savings on certification costs may vary. Not all operators obtain original (divided) certificates, and suppliers may not pass on all savings.

Implementation
The Rule(s) and Maritime Transport Instrument(s) that will implement this proposal • Part 3J: Maritime (Design, Construction and Equipment – Anchors and Cables) Rules • Maritime Transport (Anchors and Cables) Instrument [year] The rules and maritime transport instrument are expected to come into force in early 2026. These rules and MTI are not proposed to include a transition period because the proposal provides benefits and does not impose additional obligations on operators and vessel owners.
Products envisaged to support implementation Maritime NZ will provide a short guide for the sector explaining the changes introduced by the new Anchors and Cable Rules.

Question:

A 1.1 Do you agree with the proposal to reduce certification requirements for vessels of less than 24 metres in length?

[Answers: Strongly agree; Agree; Neutral; Disagree; Strongly Disagree; No comment]

Why/why not?

Proposal 2: Allowing steel wire rope to be used as anchor cable

What we are proposing

Steel wire rope will be allowed to be used as anchor cable on vessels with an Equipment Number (EN) of less than 500*. Steel wire rope must be galvanised and lubricated; have the same breaking load as the specified chain it replaces; have a specified length of pendant chain; and must be tested, certified and labelled. The master of the vessel will have a duty to ensure that the wire is periodically checked and that precautions are taken to reduce wear and tear – including that surfaces in contact with the wire are rounded with a suitable radius. This proposal will add another anchor cable option for vessel operators and align with Australia and other jurisdictions.

* Equates to a standard anchor weight of 1440 kgs

Status quo

The current rules / regulatory environment

Steel wire rope is not allowed as anchor cable under the current rules. However, comparable jurisdictions (for example Australia) allow steel wire anchor cable.

Classification societies also allow steel wire anchor cable, and some New Zealand vessels that have opted to be certified under classification society rules use steel wire anchor cable.

What is the problem / rationale for the change?

Steel wire rope anchor cable does not appear to present particular risks when used as intended, but for reasons unknown, it was not included in the 2001 rules.

Consultation with the sector has not identified any particular issues with allowing steel wire anchor cable, and has helpfully identified some conditions for its use.

Impact of the proposed change

Allowing steel wire anchor cable as an option supports the objective of having rules that are more flexible.

This proposal does not impose any additional costs.

Timing / Commencement date

Allowing steel wire anchor cable as an option will take effect on commencement of the Part 3J: Maritime (Design, Construction and Equipment – Anchors and Cables) Rules. The estimated in-force date is currently early 2026.

Options analysis

Two options were considered:

Option 1: (Status quo). Continue to exclude the use of steel wire anchor cable.

Option 2: New rules that allow the use of steel wire anchor cable that meets strength and certification conditions, and is used appropriately.

How do the options compare against the status quo

The following criteria have been used to assess the alternative option. Refer to Table 5 for an assessment against these criteria.

The changes provide flexible and adaptive regulation:	Option 2 adds another anchor cable option for vessel operators who wish to use it, and aligns the new rules with comparable jurisdictions.
Rules are clear and easier to understand and apply:	Option 2 is neutral on this criterion. The current rules do not address steel wire rope.
Maritime safety is maintained or enhanced:	Option 2 is neutral on this criterion. This proposal does not change safety settings.
Changes are practical and economically viable:	Option 2 is practical to implement. It is optional, and cost neutral. A range of factors specific to individual operators will influence their decision to use steel wire anchor cable in preference to other cable options.

Table 5: Comparing options against the status quo. Allowing steel wire rope anchor cable.

	1. Status Quo	2: Allow steel wire to be used as anchor cable (under certain conditions)
Provides flexible and adaptive regulation	0	+
Rules that are clear and easier to understand and apply	0	0
Maritime safety is maintained or enhanced	0	0
Changes are practical and economically viable	0	+
Overall assessment	**0**	**+**

Key for qualitative judgements:

++	Much better than doing nothing/the status quo/counterfactual
+	Better than doing nothing/the status quo/counterfactual
0	About the same as doing nothing/the status quo/counterfactual
-	Worse than doing nothing/the status quo/counterfactual
- -	Much worse than doing nothing/the status quo/counterfactual

Preferred option
Allowing the use of steel wire anchor cable (Option 2) is the preferred option. It is better than the status quo.
What are the marginal costs and benefits of the preferred option?
Allowing steel wire anchor cable increases the options available to a vessel operator. Vessel operators and their surveyors may need to invest some time learning about the new rules if they wish to exercise this option. There are no additional costs associated with this proposal.

Table 6: Marginal costs and benefits of allowing steel wire rope anchor cable

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
Vessel owners and operators, surveyors and suppliers	Will need to become familiar with the new rules.	Low	High Proposal is straightforward, & Maritime NZ has engaged with the sector.

Total monetised costs	-	-	-
Non-monetised costs	Users of the Maritime Rules will need to become familiar with the new rules.	Low	High Proposal is straightforward
Additional benefits of the preferred option compared to taking no action			
Vessel owners and operators	Supports flexibility by providing another choice of anchor cable.	Low	High Adds choice, and is supported by the sector. But most operators are likely to stick with what they know.
Total monetised benefits	Optional, cannot be quantified	-	-
Non-monetised benefits	Increases flexibility	Low	High

Assumptions and Notes

- Non-monetised costs are based on observations that an investment of time is required for sector participants to understand regulatory changes. These have been assessed as Low because the changes are straightforward and have been developed in consultation with the sector.
- Non-monetised benefits have been assessed as Low. This proposal is supported by the sector. However, most vessels will need to be modified in order to switch to using steel wire rope as anchor cable. This means that operators are likely to adopt the option if they are also planning other alterations to their vessel.

Implementation

The Rule(s) and Maritime Transport Instrument(s) that will implement this proposal

- Part 3J: Maritime (Design, Construction and Equipment – Anchors and Cables) Rules
- Maritime Transport (Anchors and Cables) Instrument [year]

The rules and maritime transport instrument are expected to come into force in early 2026. These rules and MTI are not proposed to include a transition period because the proposal provides an additional product option and does not impose additional obligations.

Products envisaged to support implementation

Maritime NZ will provide a short guide for the sector explaining the changes introduced by the new Anchors and Cable rules.

Question:

A 2.1 Do you agree with the conditions under which steel wire will be allowed to be used as anchor cable?

[Answers: Strongly agree; Agree; Neutral; Disagree; Strongly Disagree; No comment]

Why/why not?

Proposal 3: Allowing super high holding power (SHHP) anchors

What we are proposing

The rules will recognise super high holding power (SHHP) anchors that have been approved by a recognised classification society. Other inspecting organisations (that are not a recognised classification society) will be able to approve SHHP anchors if they obtain recognition from the Director of Maritime NZ.

This proposal will add an anchor option for vessel operators that reflects current practice, and remove the current costs associated with SHHP anchors because their use requires an exemption.

Status quo

The current rules / regulatory environment

The current rules allow high holding power anchors (HHP) but not SHHP anchors. Operators who wish to use a SHHP anchor must apply for an exemption.

Our understanding of current practice

SHHP anchors are recognised by the International Association of Classification Societies, and by recognised classification societies in New Zealand.

It is not known why the current rules do not allow for SHHP anchors.

What is the problem / rationale for the change?

SHHP anchors are widely used internationally and in New Zealand. However, vessel operators in New Zealand who wish to use a SHHP anchor must apply for an exemption, which is an additional cost and creates administrative burden.

Impact of the proposed change

Allowing SHHP anchors as an option supports the objective of having rules that are more flexible. This proposal reduces costs for operators who wish to use a SHHP anchor because they will no longer need to obtain an exemption.

Timing / Commencement date

Changes to certification requirements for anchors, chain cables and accessories will take effect on commencement of the Part 3J: Maritime (Design, Construction and Equipment – Anchors and Cables) Rules. The estimated in-force date is currently early 2026.

Options analysis

Two options were considered:

Option 1: (Status quo). Continue to exclude the use of SHHP anchors.

Option 2: New rules that allow the use of SHHP anchors if they have been approved by recognised classification society or inspecting organisation.

How do the options compare against the status quo

The following criteria have been used to assess the options. Refer to Table 7 for an assessment against these criteria.

The changes provide flexible and adaptive regulation:	Option 2 adds another anchor option for vessel operators who wish to use it.

Rules are clear and easier to understand and apply:	Option 2 makes sense. There is no obvious reason to exclude SHHP anchors.
Maritime safety is maintained or enhanced:	Option 2 does not change safety settings. Testing by a recognised classification society or inspecting organisation will provide assurance that the SHHP anchor achieves the same level of performance as the equivalent standard anchor.
Changes are practical and economically viable:	Option 2 is practical to implement, as the approval process is well understood. It is optional, and provides a cost saving for vessel operators who wish to use SHHP anchors - who would otherwise need to apply for an exemption.

Table 7: Comparing options against the status quo. Allowing super high holding power (SHHP) anchors

	1. Status Quo	2: Allow SHHP anchors
Provides flexible and adaptive regulation	0	+
Rules that are clear and easier to understand and apply	0	+
Maritime safety is maintained or enhanced	0	+
Changes are practical and economically viable	0	++
Overall assessment	**0**	**+**

Key for qualitative judgements:

++	Much better than doing nothing/the status quo/counterfactual
+	Better than doing nothing/the status quo/counterfactual
0	About the same as doing nothing/the status quo/counterfactual
-	Worse than doing nothing/the status quo/counterfactual
- -	Much worse than doing nothing/the status quo/counterfactual

Preferred option
Option 2 (allowing the use of SHHP anchors) is the preferred option. It meets all criteria and is better than the status quo.
What are the marginal costs and benefits of the preferred option?
Costs will reduce for vessel operators who wish to use SHHP anchors. Vessel operators and surveyors may face minor costs in becoming familiar with the new requirements. Refer to Table 8 and the associated Assumptions and Notes.

Table 8: Marginal costs and benefits of allowing super high holding power (SHHP) anchors

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
Vessel owners and operators and surveyors	Will need to become familiar with the new rules.	Low	High Proposal is straightforward, & Maritime NZ has engaged with the sector.
Total monetised costs	-	-	-

Non-monetised costs	Users of the Maritime Rules will need to become familiar with the new rules.	Low	High Proposal is straightforward
Additional benefits of the preferred option compared to taking no action			
Vessel owners and operators	Supports flexibility by providing another choice of anchor	Low	High Adds choice, and is supported by the sector.
Vessel owners and operators	Removes cost of applying for an exemption to have a SHHP anchor	$800 per vessel that uses a SHHP anchor (see Assumptions and Notes)	Medium
Total monetised benefits	Optional, cannot be quantified	-	-
Non-monetised benefits	Increases flexibility	Low	High

Assumptions and Notes

- Non-monetised costs are based on observations that an investment of time is required for sector participants to understand regulatory changes. These have been assessed as low because the changes are straightforward and have been developed in consultation with the sector.
- Non-monetised benefits have been assessed as Low. Operators will realise the benefits of having the option of using a SHHP anchor when they are making alterations to the vessel, or when they need to replace an anchor – neither happens often.
- Monetised benefits are based on a reduction in exemption costs. Each exemption application is estimated at $800, based on two hours of surveyor time at $200 to help prepare the exemption application and two hours per exemption application x $245 – the hourly rate fee specified in the Maritime Charges) Regulations 2014.

Implementation

The Rule(s) and Maritime Transport Instrument(s) that will implement this proposal

- Part 3J: Maritime (Design, Construction and Equipment – Anchors and Cables) Rules
- Maritime Transport (Anchors and Cables) Instrument [year]

The rules and maritime transport instrument are expected to come into force in early 2026. These rules and MTI are not proposed to include a transition period because the proposal provides an additional product option and does not impose additional obligations.

Products envisaged to support implementation

Maritime NZ will provide a short guide for the sector explaining the changes introduced by the new Anchors and Cable rules.

Question:

A 3.1 Do you agree with the proposal to allow SHHP anchors if they have been approved by a recognised classification society or inspecting organisation?

[Answers: Strongly agree; Agree; Neutral; Disagree; Strongly Disagree; No comment]

Why/why not?

Proposal 4: Allowing a passenger vessel of less than 24 metres in length, that would otherwise require two anchors, to carry a single anchor

What we are proposing

Passenger vessels of less than 24 metres in length that would otherwise require two anchors will be allowed to carry a single anchor if:

- They operate in inshore limits (a) – i.e. the restricted limits specified in Part 2 of Appendix 1 of Maritime Rules Part 20 Operating Limits; and
- Travel from a wharf to a wharf (i.e. they do not stop or anchor under normal operations).

This proposal reflects current exemptions that have been granted. It will add an option and remove the current costs associated with applying for an exemption.

Status quo

The current rules / regulatory environment

The current rules set thresholds above which a vessel requires two anchors. For passenger vessels operating in enclosed water limits, two anchors must be carried when the vessel needs an anchor of more than approximately 92 kgs. For passenger vessels operating in inshore water limits, the threshold is 22.5 kgs.

Our understanding of current practice

Passenger ferry operators have applied for and been granted exemptions to carry a single anchor.

What is the problem / rationale for the change?

Passenger vessels such as ferries travel from a wharf to a wharf on set routes. For reasons of comfort and safety, ferry operators do not operate above specified wind and wave height limits. These reasons mean that passenger vessels are unlikely to ever need to use an anchor. It follows that they are very unlikely to need a spare anchor on the off-chance that the first anchor fails. In these circumstances, the second anchor represents an unnecessary cost. It adds weight, which increases fuel consumption, and must be stored, which takes up valuable space on board.

Impact of the proposed change

The proposal will provide cost savings for an estimated 75 vessels that currently require two anchors (with cable for each anchor). They will now be able to carry a single anchor and cable.

Timing / Commencement date

Changes to certification requirements for anchors, chain cables and accessories will take effect on commencement of the Part 3J: Maritime (Design, Construction and Equipment – Anchors and Cables) Rules. The estimated in-force date is currently early 2026.

Options analysis

Two options were considered:

Option 1: (Status quo). Continue the current approach of requiring a second anchor for a passenger vessel such as a ferry if it operates in enclosed water limits and needs an anchor of more than about 92 kgs; or if it operates in inshore water limits and needs an anchor of 22.5 kgs.

Option 2: (Preferred approach). New rules that allow a passenger vessel of less than 24 metres in length that would otherwise require two anchors to carry a single anchor if it operates in the restricted limits

specified in Part 2 of Appendix 1 of Maritime Rules Part 20 Operating Limits; and only travels from a wharf to a wharf.

24 metres in length has been selected as the threshold below which the proposal applies. As a vessel increases in linear size the force it exerts on an anchor and cable increases logarithmically, so the risk of failure (and the need for back-up) increases. 24 metres is a commonly used threshold at which many other requirements apply.

How do the options compare against the status quo

The following criteria have been used to assess the alternative option. Refer to Table 9 for an assessment against these criteria.

The changes provide flexible and adaptive regulation:	Option 2 provides vessel operators with an option to carry a single anchor when two would otherwise be required.
Rules are clear and easier to understand and apply:	Option 2 sets clear thresholds for when the option to carry a single anchor applies.
Maritime safety is maintained or enhanced:	The conditions for when Option 2 applies are designed to maintain current safety settings.
Changes are practical and economically viable:	Option 2 is straightforward to implement. It is optional, and provides a potential cost saving for operators of passenger ferries of less than 24 metres in length, both in reducing the need to carry two anchors and cables, and the need to apply or re-apply for exemptions to carry a single anchor.

Table 9: Comparing options against the status quo. Allowing a passenger vessel of less than 24 metres in length to carry a single anchor

	1. Status Quo	2: Allow a single anchor provided conditions apply
Provides flexible and adaptive regulation	0	+
Rules that are clear and easier to understand and apply	0	+
Maritime safety is maintained or enhanced	0	+
Changes are practical and economically viable	0	+
Overall assessment	**0**	**+**

Key for qualitative judgements:

++	Much better than doing nothing/the status quo/counterfactual
+	Better than doing nothing/the status quo/counterfactual
0	About the same as doing nothing/the status quo/counterfactual
-	Worse than doing nothing/the status quo/counterfactual
- -	Much worse than doing nothing/the status quo/counterfactual

Preferred option

Option 2 (Enabling some Passenger vessels less than 24 metres to only carry a single anchor rather than two) is the preferred option. It meets all criteria and is better than the status quo.

What are the marginal costs and benefits of the preferred option?

Costs will reduce for operators of passenger ferries of less than 24 metres in length that currently require two anchors and who wish to use a single anchor. Vessel operators and surveyors may face minor costs in becoming familiar with the new requirements.

Refer to Table 10 and the associated Assumptions and Notes.

Table 10: Marginal costs and benefits of allowing a passenger vessel of less than 24 metres in length to carry a single anchor

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
Total monetised costs	-	-	-
Non-monetised costs	Users of the Maritime Rules will need to become familiar with the new rules.	Low	High Proposal is straightforward, & Maritime NZ has engaged with the sector.
Additional benefits of the preferred option compared to taking no action			
Vessel owners and operators	Supports flexibility by providing up to 75 operators with the option of using one anchor	Low	High Adds choice, and is supported by the sector.
Vessel owners and operators	Removes cost of applying for an exemption to have a single anchor. Removes costs of an anchor and cable.	$1,800 per operator that takes advantage of the proposal	Medium Data is not available (see note below)
Total monetised benefits	Optional, cannot be quantified	-	-
Non-monetised benefits	Increases flexibility	Low	High

Assumptions and Notes

- Non-monetised costs are based on observations that an investment of time is required for sector participants to understand regulatory changes. These have been assessed as low because the changes are straightforward and have been developed in consultation with the sector.
- Monetised benefits are based on a saving of $1000 in not having to replace and anchor, plus a reduction in exemption costs. Each exemption application is estimated at $800, based on two hours of surveyor time at $200 to help prepare the exemption application and two hours per exemption application x $245 – the hourly rate fee specified in the Maritime Charges) Regulations 2014.

Implementation

The Rule(s) and Maritime Transport Instrument(s) that will implement this proposal

- Part 3J: Maritime (Design, Construction and Equipment – Anchors and Cables) Rules
- Maritime Transport (Anchors and Cables) Instrument [year]

The rules and maritime transport instrument are expected to come into force in early 2026. These rules and MTI are not proposed to include a transition period because the proposal provides an additional compliance option that reduces cost.

Products envisaged to support implementation

Part 3J Anchors and Cables: Proposal summary

Maritime NZ will provide a short guide for the sector explaining the changes introduced by the new Anchors and Cable rules.

Question:

A 4.1 Do you agree with the proposal to allow a passenger vessel of less than 24 metres in length that would otherwise require two anchors to carry a single anchor if it operates in the restricted limits specified in Part 2 of Appendix 1 of Maritime Rules Part 20 and only travels from a wharf to a wharf?

[Answers: Strongly agree; Agree; Neutral; Disagree; Strongly Disagree; No comment]

Why/why not?

How to have your say

The deadline for providing comment on these proposals is **5pm on Friday 18 October 2024**.

12. This document is part of a package of documents on the proposed changes to the design, construction and equipment rules. Information on this consultation will be available on Maritime NZ's website.
13. Subject to interest, Maritime NZ will hold online information sessions on the proposals on **27 and 28 August and 24 and 25 September *[times to be confirmed]***. Please contact us at the email address provided below if you would like to attend a session or if you would like us to contact you to discuss any of the proposals.
14. We welcome any feedback you would like to provide. Submissions can be made by completing the submission form on our website *(https:// www.maritimenz.govt.nz/public/consultation/DCE-40-series-package-1/)*, or in any other written form; and:
    - Emailed to us at 40.series@maritimenz.govt.nz; or
    - Posted to the Regulatory Reform Projects Team, Maritime NZ, PO Box 25620, Wellington 6140.
15. This document includes questions to help you focus your feedback. Answering the questions is optional.

Submissions are public information

16. Please let us know if your comments are commercially sensitive or if for some reason you consider they should not be disclosed. If your submission is subject to an Official Information Act (OIA) request, Maritime NZ will consider your confidentiality request in accordance with the grounds for withholding information set out in the OIA.
17. In addition, if you are an individual (that is your comments are made personally and not on behalf of a company or an organisation), please let us know if you have reasons that your identity should not be disclosed.
18. We will acknowledge all submissions that we receive. Once the rule is finalised a summary of submissions will be published on our website.

Questions

19. The following questions have been included to help focus your feedback. Answering the questions is optional. Any and all feedback is welcome.

Proposal 1: Reducing certification requirements for anchors, chain cables and accessories

A 1.1 Do you agree with the proposal to reduce certification requirements for vessels of less than 24 metres in length?

[Answers: Strongly agree; Agree; Neutral; Disagree; Strongly Disagree; No comment]

Why/why not?

Proposal 2: Allowing steel wire rope to be used as anchor cable

A 2.1 Do you agree with the conditions under which steel wire will be allowed to be used as anchor cable?

[Answers: Strongly agree; Agree; Neutral; Disagree; Strongly Disagree; No comment]

Why/why not?

Proposal 3: Allowing super high holding power (SHHP) anchors

A 3.1 Do you agree with the proposal to allow SHHP anchors if they have been approved by a recognised classification society or inspecting organisation?

[Answers: Strongly agree; Agree; Neutral; Disagree; Strongly Disagree; No comment]

Why/why not?

Proposal 4: Allowing a passenger vessel of less than 24 metres in length, that would otherwise require two anchors, to carry a single anchor

A 4.1 Do you agree with the proposal to allow a passenger vessel of less than 24 metres in length that would otherwise require two anchors to carry a single anchor if it operates in the restricted limits specified in Part 2 of Appendix 1 of Maritime Rules Part 20 and only travels from a wharf to a wharf?

[Answers: Strongly agree; Agree; Neutral; Disagree; Strongly Disagree; No comment]

Why/why not?

Appendix 1: 'Snapshot' of the proposed changes to the Anchors and Cables rules

<table>
<tr><th colspan="6">Anchors and Cables – Part 3J</th></tr>
<tr><td>General approach</td><td colspan="5">Overall approach:
The current rules found in 9 locations will be consolidated and harmonised into one Rule Part and one MTI. This will mean some wording changes and a different format, but most current requirements are much the same. The proposed changes reduce certification requirements for vessel of less than 24m in length, and increase options. They do not impose duties or costs.
The new Anchors and Cables rules will apply to all vessels except Cape Town Fishing Vessels, SOLAS Ships, Novel Ships and Hovercraft.
Existing vessels:
Existing vessels are not affected by change (refer the Schedule to the Rule). They will be able to continue to comply with the current rules, after they have been revoked, provided that—
• The anchors, cables, accessories etc. are in good condition; and
• The vessel does not have a major change that invalidates the basis on which the anchor weight and cable size was determined.
Vessels of 24m or more in load line length:
No significant changes are proposed for vessels of 24m or more in load line length.</td></tr>
<tr><td rowspan="5"></td><td>Vessel type</td><td>Operating limits</td><td>Vessel length</td><td>Requirement</td><td>Rule/MTI</td></tr>
<tr><td>Certification requirements for anchors, chain cables and accessories will reduce</td><td>All vessels</td><td>All operating limits</td><td>Less than 24m in load line length</td><td>Anchors of 75 kgs or more and chain cables and accessories of 14mm or more will require a certificate issued by the manufacturer (but not by a Classification Society).</td><td>Rule C3.1</td></tr>
<tr><td>Super high holding power (SHHP) anchors will be allowed</td><td>All vessels</td><td>All operating limits</td><td>All lengths</td><td>Must have a type approval by a recognised classification society</td><td>MTI 3.1</td></tr>
<tr><td>Some vessels that would otherwise require two anchors will be allowed to carry a single anchor</td><td>Passenger vessel</td><td>Restricted limits specified in Part 2 of Appendix 1 of Maritime Rules Part 20 *</td><td>Less than 24m in length</td><td>Must travel from a wharf to a wharf – will apply to a vessel that does not stop or anchor under normal operations.</td><td>Rule 2.2</td></tr>
<tr><td>Steel wire rope will be allowed for use as anchor cable</td><td>All vessels</td><td>All operating limits</td><td>All lengths</td><td>• Will apply to vessels with an Equipment Number (EN) of 500 or less - which equates to a standard anchor weight of approximately 1440 kgs.
• Each surface the steel wire rope comes into contact with (e.g. roller or pulley) must have a radius of 10 times the diameter of the steel wire rope.
• Maintenance conditions apply.</td><td>Rule B1.1
MTI 2.6</td></tr>
</table>

* More information on the specific locations and boundaries of these operating limits can be found in Part 20 of the Maritime Rules, available on the Maritime NZ website at https://www.maritimenz.govt.nz/media/knfnwbso/part20-maritime-rule.pdf. Part 20